

STEPHANIE M. HINDS (CABN 154284)  
United States Attorney

THOMAS A. COLTHURST (CABN 99493)  
Chief, Criminal Division

FRANK J. RIEBLI (CABN 221152)  
ERIC CHENG (CABN 274118)  
Assistant United States Attorneys  
450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7200  
FAX: (415) 436-7234  
Frank.Riebli@usdoj.gov  
Eric.Cheng@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. 21-CR-274 CRB
	)	
Plaintiff,	)	
	)	STIPULATION AND PROPOSED ORDER
v.	)	CONTINUING HEARING
	)	
IAN BENJAMIN ROGERS,	)	
	)	
Defendant.	)	
	)	
	)	

On July 8, 2021, the grand jury issued a six-count indictment charging Ian ROGERS and Jarrod COPELAND with conspiring to destroy a building by arson or explosive device, weapons violations and obstruction of justice. The parties made their first appearance in District Court on August 18, 2021. At that time, ROGERS appeared from Napa County Jail (where he was then housed) pursuant to a federal writ issued February 18, 2021. Following a series of stipulated continuances, the Court set the matter for a status hearing on February 2, 2022.

In the past 30 days, the government has secured ROGERS's transfer from state to federal custody (with the concurrence of state authorities), conducted a "reverse proffer" for ROGERS, provided ROGERS a draft plea agreement, and begun negotiations for a global resolution of all of the

1 charges – federal and state – ROGERS presently faces. The parties agree that additional time is needed  
2 to determine whether a resolution is possible and, if so, coordinate it with federal and state authorities.  
3 The parties also agree that ROGERS needs additional time to consider the information the government  
4 provided him during the reverse proffer.

5 The parties therefore request that the Court continue the status hearing from February 2, 2022 to  
6 March 2, 2022. The continuance will allow the parties time to coordinate with counsel in the parallel  
7 state proceeding, and allow ROGERS time to consider the information the government provided him  
8 and its implications for his decision whether to resolve the case without a trial.

9 For these reasons, and to allow for the effective preparation of counsel, the parties agree that the  
10 ends of justice served by excluding the time from February 2, 2022 through March 2, 2022 from  
11 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a  
12 speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

13 IT IS SO STIPULATED.

14 DATED: February 2, 2022

Respectfully submitted,

STEPHANIE M. HINDS  
United States Attorney

16  
17 /s/  
FRANK J. RIEBLI  
ERIC CHENG  
Assistant United States Attorneys

19  
20 /s/ Frank Riebli w/ permission  
COLIN COOPER  
Attorney for Ian Rogers

**[PROPOSED] ORDER**

For the reasons set forth above, the Court hereby continues the status hearing in the above-captioned matter from February 2, 2022 until **March 2, 2022, at 9:00 a.m.** Further, to allow for the continued production of discovery and the effective preparation of counsel, the Court finds that the ends of justice served by granting the continuance outweigh the interests of the public and the defendant, and thus the Court excludes that period of time from the running of the speedy trial clock under Rule 5.1 and 18 U.S.C. § 3161(b).

IT IS SO ORDERED.

DATED: February \_\_\_\_, 2022

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HON. CHARLES R. BREYER  
United States District Judge